

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

RICHARD MEYER,
Plaintiff,

v.

MARK WAID,
Defendant.

§
§
§
§
§
§

CASE NO.: 1:18-CV-00800

(Jury Demanded)

**UNOPPOSED MOTION TO EXTEND TIME TO RESPOND
TO DEFENDANT'S MOTION TO DISMISS FOR LACK OF JURISDICTION**

Richard Meyer files this Unopposed Motion to Extend Time to Respond to Defendant's Motion to Dismiss for Lack of Personal Jurisdiction (the "Motion") [Dkt. 10].

1. Defendant Mark Waid filed the Motion on November 2, 2018. Under Rule CV-7(e)(2) of this Court's Local Rules, Meyer's response to the Motion is currently due on November 16, 2018. Meyer requests that the Court extend his deadline for responding to the Motion for fourteen days until November 30, 2018. Counsel for the parties are in discussions regarding whether jurisdictional discovery is warranted in this matter and need additional time to confer in that regard.

2. Meyer and Waid's counsel have conferred regarding the relief sought by this motion. Waid's counsel confirmed that this motion is unopposed.

Accordingly, Plaintiff Richard Meyer respectfully requests that the Court order that the deadline for Meyer to respond to Defendant's Motion to Dismiss for Lack of Personal Jurisdiction be extended until November 30, 2018, and that the Court grant such other and further relief to which Meyer may be justly entitled.

Respectfully submitted,

FRITZ, BYRNE, HEAD & GILSTRAP, PLLC
221 West Sixth Street, Suite 960
Austin, Texas 78701
Telephone: (512) 476-2020
Telecopy: (512) 477-5267

BY: /s/ Daniel H. Byrne
Daniel H. Byrne
State Bar No. 03565600
Email: dbyrne@fbhg.law
Dale L. Roberts
State Bar No. 24001123
Email: droberts@fbhg.law

ATTORNEYS FOR PLAINTIFF RICHARD MEYER

CERTIFICATE OF SERVICE

I certify that this document was served on the counsel of record listed below using the Court's ECF system on November 15, 2018:

Beverly Reeves
breeves@reevesbrightwell.com
Ryan Pierce
rpierce@reevesbrightwell.com
Reeves & Brightwell, LLP
221 West Sixth Street, Suite 1000
Austin, Texas

Mark S. Zaid
mark@markzaid.com
Mark S. Zaid, P.C.
1250 Connecticut Avenue, Northwest, Suite 700
Washington, D.C. 20036

By: /s/ Daniel H. Byrne
Daniel H. Byrne